## **AFFIDAVIT**

(SWORN STATEMENT)

Date: 6-7-2022, 2022
My legal name is halla Miller ("Affiant") and acknowledge I am:  • Age: 27  • Address: 75 Short Street Blairs Ville PM 15717
Being duly sworn, hereby swear under oath that:  See attached Statement
Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.  Affiant's Signature:  NOTARY ACKNOWLEDGEMENT
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.
State of Pennsylvania County of Allegheny  On June 7, 20 20 before me, Kayla Muller, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on
the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.  I certify under PENALTY OF PERJURY under the laws of the State of Pensylvania that the foregoing paragraph is true and correct.
WITNESS my hand and official seal.
Signature (Seal) Commonwealth of Pennsylvania - Notary Seal Cristin Gorajczyk, Notary Public Westmoreland County My commission expires April 15, 2026 Commission number 1417790

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County of Alleshooy

Member, Pennsylvania Association of Notaries

When I begin to talk about the Pittsburgh Renaissance Festival and it's problems with covering up the grooming, sexual harassment, and sexual assault of underage and young women, I have to start in 2012. In 2012, I had started working at the Pittsburgh Renaissance Festival for a vendor at the age of 17. The majority of the girls who worked for this same vendor were also underage and that was something that seemed to be pretty well known throughout Pittsburgh Renaissance Festival.

While I was the age of 17, an individual on Pittsburgh Renaissance Festival's cast, Eric Barvinchak, took an interest in me. At the time of this, he was 25, 8 years older than me. Eric spent much of his time during the 2012 Pittsburgh Renaissance Festival grooming me through positive reinforcement, relationship-forming, gift-giving and other methods into what would become an illegal sexual relationship under Pennsylvania State Law.

James Amor, the director of the Pittsburgh Renaissance Festival cast, was aware that this grooming situation was happening by Eric Barvinchak. During the 2012 season, James Amor approached me multiple times while working at the Pittsburgh Renaissance Festival to "check up" on Eric. He would ask me questions such as if Eric had been by to see me that day or when was the last time he had come to visit me at my work station. He would ask me about the gifts that Eric had given me as well. The fact that this grooming and type of relationship was illegal did not appear to have any effect on Eric Barvinchak's position at Pittsburgh Renaissance Faire as time moved forward. This relationship and grooming was also not reported as any type of suspected child abuse to my knowledge, despite James Amor being a mandated reporter due to his job outside of Pittsburgh Renaissance Festival as a licensed dentist in the state of Pennsylvania and mandated reporter law in Pennsylvania stating that a mandated reported must report any suspicious of child abuse at any regularly scheduled program, activity, or service.

I continued to work for this same vendor for the next few years at Pittsburgh Renaissance

Festival as a summer job to help myself through college. I made friends who worked there along the way as well. In April of 2015, I chose to audition for Pittsburgh Renaissance Festival cast. I was "hired". I use hired very loosely because cast individuals do not become hired until the first day of the festival season when they sign contracts and agree to follow the Code of Conduct given to us. Contracts which I would learn many years later, are in violation of Pennsylvania Labor Law. Before that point, cast members work unpaid by attending mandatory for employment rehearsals during the weekends leading up to the festival. It was at one of these rehearsals in 2015 where James Amor sexually harassed me himself.

During one of our unpaid rehearsals, James Amor's son, Jimmy Amor, was giving a presentation. The group of cast members had gathered around him in a circle in order to best observe this presentation. It was during this presentation that I realized I had a bit far stepped forward out of the circle and was standing in front of James Amor. After realizing this, I apologized for blocking his view of the presentation and stepped out of his way. James Amor then stated to me, "That's okay. I would rather stare at your ass than at Jimmy anyway."

In the moment, I was taken aback by this statement as it was unwanted and unprovoked. I spoke about this to another girl on cast I was friends with Stephanie Kulikowski. Stephanie told me, "Oh that's just Doc (James Amor's nickname). He says things like that to all the young girls on cast. You just have to learn to ignore him." I felt really uncomfortable with her answer, especially knowing that myself and other young women, some of whom were underage, shared a dressing room with this man. I decided to try to take Stephanie's advice and "let it go". After all, apparently this was normal. Even if it definitely didn't feel normal.

Another friend I made that year on the Pittsburgh Cast was Rachel Hull. Rachel was another one of the individuals who had told me that "This is normal" when I discussed the comments James Amor had made to me. I would only learn later that for Rachel this type of harassment was all too normal and had been going on for years. Rachel told me about how her character "Sally Brown" was chosen for her by James Amor specifically to mock her. Sally Brown in many Renaissance era songs, is often referenced to as a sex worker. Rachel had also engaged in legal sex work. Rachel shared that James Amor discovered that she had engaged in this and also told me about how other members of cast had found out, as cast members were sharing pornographic pictures and videos of her back and forth. Rachel also told me about how another cast member Gene Quinn Harlin, had spent time sexually harassing her. Rachel shared that Harlin was one of the individuals involved in sharing pictures of her. She also shared that he was the one who had told multiple sexually explicit jokes about her to other members of cast. Rachel informed me that she had confided in two other cast members, Shawn Howland and Nate Forbes, about what had happened to her. Both Rachel and Shawn Howland allowed me to review the text messages they had sent each other about Rachel's experiences.

At this time, I became wary of the individuals on Pittsburgh Renaissance Festival Cast, in particular James Amor and Gene Quinn Harlin, due to how they had treated me or other women on cast at that time. So throughout the season of 2015, I tried my best to be polite and avoid them when able due to the experiences of harassment from myself and others.

In 2016, the harassment became worse for myself. During an unpaid rehearsal, there was a music rehearsal as cast members do engage in singing songs at times during the day. The rehearsal was lead by Gene Quinn Harlin. During this part of the rehearsal, I began to ask him questions about the piece we were singing as I, at this time, had fifteen years of musical training.

I wanted to discuss the arrangement of the piece as it didn't seem fitting for what we were trying to use it for. I was told by Gene Quinn Harlin, "That's the way I want it to be so don't ask questions" in a tone that was very harsh, rude, and unprofessional.

At a later rehearsal, I was helping other musicians follow tempo by arm conducting for a piece that Gene Quinn Harlin was trying to rehearse. As the tempo had changed drastically from the pieces original tempo it was hard for the musicians to follow along with just reading sheet music. When I was asked by Gene Quinn Harlin what I was doing I replied that it was hard for the other musicians to follow him when he was simply playing guitar. Later in that rehearsal, Eric Barvinchak who was still on cast approached me and informed me that I needed to "stop being involved in the music aspect of cast". Eric told me "That's Quinn's (meaning Gene Quinn Harlin) job not yours." Eric also warned me, "If you keep getting in Quinn's way, what happened to Rachel will happen to you too."

I knew what had happened to Rachel. I knew that Rachel had spent what at this point would have been years on cast being sexually harassed. I knew that the sexual harassment meant Gene Quinn Harlin making sexually explicit jokes about you to other cast members and James Amor assigning you a character to act and represent that was inherently sexually degrading.

After that conversation, I chose to stay further away from Gene Quinn Harlin and James Amor and to not speak with them unless spoken to by them.

At a third rehearsal, there was another singing rehearsal. I chose to stand off to the side, so as I could avoid the two men, Gene Quinn Harlin and James Amor, who had threatened to sexually harass me or who already had sexually harassed me. I was called to be closer to them by Patti Amor, James Amor's wife. It was at this time that Patti Amor and another woman on cast Lois began to make harassing remarks to me about why I was "being dramatic" and "acting like I

was in high school". I then spoke out loudly and said, "It is not being dramatic to try to defend myself or other women on this cast and how they are treated. It is not 'high school' to think that how women on this cast are treated is wrong." It was after this that I was able to drive home, as I had officially quit Pittsburgh Renaissance Festival Cast by this outburst.

Later that day I met with Lori Hughes, who was the closest thing to Human Resources the Pittsburgh Renaissance Festival had at that time. Lori and I were able to talk about my experiences. Lori and I discussed my ability to return to Pittsburgh Renaissance Festival and work for a vendor instead of for cast. Lori agreed after reviewing my contract with me, that I was able to return to work as a vendor for the 2016 season because I had not signed a 2016 contract. She also informed me that she would take this information to James Paradise and James Paradise Junior, the two individuals who own and operate Pittsburgh Renaissance Festival.

When the 2016 season came, I was hired by a vendor and was able to work. Until James and Patti Amor had me removed from the Pittsburgh Renaissance Festival due to violation of contract. I was informed this by the vendor I was working for. I knew this wasn't correct information as I had been told by Lori Hughes that I was able to work for this vendor so I called the office of the Pittsburgh Renaissance Festival to review my file. I was then told from the office that I was actually removed because I was "mean" to Patti Amor. This was in specific reference to the time I stood up for myself while experiencing sexual harassment. Due to this, I experienced a loss of wages from the 2016 season and every season moving forward as I was not allowed to work on the Pittsburgh Renaissance Festival site.

Years later, on September 3<sup>rd</sup> of 2019, I chose to visit Pittsburgh Renaissance Festival as a paying customer, as I did still have friends who worked there. During that entire day I was stalked by James Amor while I was on the festival site. I could not turn around without him

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being less than ten feet away from me watching me. He followed me across the entire site. He stood outside of booths that I was shopping in. He watched me purchase food from food vendors. I could not escape him. Despite wanting to attempt to enjoy a day with my friends, I spent that day being stalked by the same individual who had sexually harassed me years prior.

On November 7<sup>th</sup> of 2021, I was made aware of a blog post my an individual I used to work Pittsburgh Renaissance Festival with that mentioned both the festival and a girl named Kayla. The blog post specifically talked about experiences of sexual harassment and assault that had taken place at Pittsburgh Renaissance Festival that had been covered up by James Amor. I went to read the blog post to investigate if this was something that was truly about me. Some of the facts were wrong, but I expected them to be. After all, it had been 6 years since the original incident. There were some things bound to get lost.

Some differences between my real experience included; I wasn't dating Shawn Howland at the time, but we were friends as I was with many other cast members. I never accused Gene Quinn Harlin of sexual assault. I did accuse Gene Quinn Harlin and James Amor with harassment and sexual harassment. I had heard stories of what had happened to another individual on cast (Rachel Hull) who had experienced harassment and had chosen to distance myself from both of them for my safety. I did stand up for myself to Patti Amor when I was experiencing harassment and being asked to work with my harassers, though not in quite the way the blog describes. But, for being six years removed from the scenario, and told from how many people who aren't myself, the blog holds mostly accurate.

The biggest thing is that I would like this to be over. I know there are girls who came after me who had these same grooming, harassment, and assault experiences. I would like for them to experience justice because at this point, it's too late for me. In an ideal world, I'd like

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what is at this point almost seven years of lost wages back, because I would have never stopped working at the Pittsburgh Renaissance Festival if I wasn't sexually harassed. In an ideal world, James Amor and Gene Quinn Harlin would stop talking about me and my experiences to other individuals. Other individuals who can also cause me to lose wages as I work on the renaissance festival circuit throughout the country. But I recognize that an ideal world isn't one that I'm blessed enough to live in. I can however share the truth of my story which is that Gene Quinn Harlin and James Amor threatened me and sexually harassed me at Pittsburgh Renaissance Festival and then covered it up for years afterwards, in hopes they could get away with it.